

GUNDERSON, PALMER, GOODSSELL & NELSON, LLP

ATTORNEYS AT LAW

J. CRISMAN PALMER
G. VERNE GOODSSELL
JAMES S. NELSON
DANIEL E. ASHMORE
TERENCE R. QUINN
DONALD P. KNUDSEN
PATRICK G. GOETZINGER
TALBOT J. WIECZOREK
MARK J. CONNOT
JENNIFER K. TRUCANO
DAVID E. LUST

ASSURANT BUILDING
440 MT. RUSHMORE ROAD
POST OFFICE BOX 8045
RAPID CITY, SOUTH DAKOTA 57709-8045
TELEPHONE (605) 342-1078 • FAX (605) 342-0480
www.gundersonpalmer.com
ATTORNEYS LICENSED TO PRACTICE IN
SOUTH DAKOTA, NORTH DAKOTA, IOWA, NEBRASKA
COLORADO, MONTANA, WYOMING & MINNESOTA

THOMAS E. SIMMONS
TERRI LEE WILLIAMS
PAMELA SNYDER-VARNS
SARA FRANKENSTEIN
AMY K. KOENIG
JASON M. SMILEY
SHANE C. PENFIELD
JONATHAN M. OOSTRA
MATTHEW E. NAASZ
WYNN A. GUNDERSON
Of Counsel

November 13, 2006

E-FILING at PUCDOCKETFILINGS@state.sd.us

Ms. Patricia Van Gerpen
South Dakota Public Utilities Commission
Capitol Building, 1st Floor
500 East Capitol Avenue
Pierre SD 57501-5070

RE: IN THE MATTER OF THE PETITION OF VENTURE COMMUNICATIONS
COOPERATIVE FOR SUSPENSION OR MODIFICATION OF LOCAL DIALING
PARITY RECIPROCAL COMPENSATION OBLIGATIONS
SDPUC Docket File Number TC 06-181
GPGN File No. 7401.040099

Dear Ms. Van Gerpen:

Enclosed for filing please find RCC's Petition to Intervene Suspension or Modifications of Local Dialing Parity Reciprocal Compensation Obligations in the above-entitled matter. The original will be sent via U.S. Mail today.

Sincerely,



Talbot J. Wieczorek

TJW:klw

Enclosure

c: Darla Rogers/Margo Northrup
Ben Dickens/Mary Sisak
Harlan Best
Rolayne Wiest
Clients

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE PETITION OF
VENTURE COMMUNICATIONS COOPERATIVE
FOR SUSPENSION OR MODIFICATION OF
LOCAL DIALING PARITY RECIPROCAL
COMPENSATION OBLIGATIONS

DOCKET No. TC06-181

RURAL CELLULAR CORPORATION'S PETITION TO INTERVENE

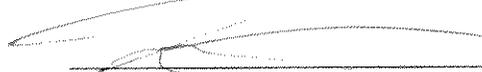
Rural Cellular Corporation (hereinafter "RCC") hereby petitions the Commission for intervention in the above-captioned proceeding pursuant to SDCL § 1-26-17.1 and A.R.S.D. §§ 20:10:01:15.02, 20:10:01:15.03 and 20:10:01:15.05. In support hereof, RCC states as follows:

1. RCC is a Commercial Mobile Radio Service ("CMRS") provider serving various areas in the state of South Dakota. RCC's service overlaps the service area of at least four of Venture Communications' wire centers in the northeast corner of the state.
2. On October 24, 2006, Venture Communications Cooperative (hereinafter "Venture") filed with this Commission a Petition for Suspension or Modification of Local Dialing Parity Reciprocal Compensation Obligations asking this Commission to grant an Order excusing Venture from its statutory obligations to provide dialing parity to competing providers of telephone exchange service, to transport its traffic to competing carriers, excuse the Petitioner from paying reciprocal compensation on traffic delivered to wireless carriers in the same MTA under certain circumstances and enter an Order requiring all wireless carriers to provide a forward looking cost study rather than using symmetric compensation.
3. Prior to Venture's filing of its petition for arbitration, RCC had been attempting to obtain number blocks from Venture in at least one wire center in order to resolve dialing parity issues. These dialing parity issues are yet unresolved.
4. RCC currently has customers in the Venture wire centers where RCC provides service and is seeking to expand its customer base. The Commission's decision on Venture's petition would favorably or adversely bind and affect RCC and RCC's ability to serve its current and future customers in the Venture wire centers where it does business.
5. RCC's pecuniary interest would be directly and immediately affected by the Commission's decision in Venture's petition as it would impact the customers of RCC, both current and future and RCC's ability to do business in Venture wire center areas.

WHEREFORE, based on the foregoing, RCC is an interested party in this matter and should be permitted to intervene.

Dated this 13 day of November, 2006.

Attorneys for Rural Cellular Corporation



Talbot J. Wieczorek
GUNDERSON, PALMER, GOODSSELL
& NELSON, LLP
440 Mt. Rushmore Road, Fourth Floor
PO Box 8045
Rapid City SD 57709
605-342-1078
Fax: 605-342-0480

CERTIFICATE OF SERVICE

I hereby certify that on the 13 day of November 2006, a true and correct copy of **RCC Petition to Intervene** was sent electronically and by first-class, U.S. Mail, postage paid to:

dprogers@riterlaw.com
MS DARLA POLLMAN ROGERS
ATTORNEY AT LAW
RITER ROGERS WATTIER & BROWN LLP
PO BOX 280
PIERRE SD 57501-0280

m.northrup@riterlaw.com
MS MARGO D NORTHRUP
ATTORNEY AT LAW
RITER ROGERS WATTIER & BROWN LLP
PO BOX 280
PIERRE SD 57501-0280

Rolayne.wiest@state.sd.us
MS ROLAYNE WIEST
STAFF ATTORNEY
SOUTH DAKOTA PUBLIC UTILITIES
COMMISSION
500 EAST CAPITOL
PIERRE SD 57501

bhd@bloostonlaw.com
MR BEN H DICKENS JR
ATTORNEY AT LAW
BLOOSTON MORDKOFKY DICKENS
DUFFY & PENDERGAST
2120 L STREET NW SUITE 300
WASHINGTON DC 20037

mjs@bloostonlaw.com
MS MARY J SISAK
ATTORNEY AT LAW
BLOOSTON MORDKOFKY DICKENS
DUFFY & PENDERGAST
2120 L STREET NW, SUITE 300
WASHINGTON DC 20037

harlan.best@state.sd.us
HARLAN BEST
STAFF ANALYST
SOUTH DAKOTA PUBLIC UTILITIES
COMMISSION
500 EAST CAPITOL
PIERRE SD 57501


Talbot J. Wiczorek